

TCG

DOCKET FILE COPY ORIGINAL

Teleport Communications Group
Two Teleport Drive
Staten Island, NY 10311-1004
Tel: 718.355.2000
Fax: 718.355.2147

May 3, 1996

BY HAND DELIVERY

William F. Caton
Acting Secretary
Federal Communications Commission
Room 222
1919 M Street, NW
Washington, DC 20554

RECEIVED

MAY - 3 1996

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Re: Written Ex Parte Presentation -
CC Docket No. 93-162

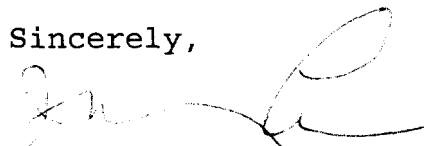
Dear Mr. Caton:

Teleport Communications Group Inc. ("TCG") hereby gives notice of a written ex parte presentation in the above-referenced proceedings. The presentation was made in the form of the attached letter.

TCG delivered the attached letter to an individual in the Common Carrier Bureau.

Two copies of the letter are submitted herewith pursuant to Section 1.1206(a)(1) of the Commission's Rules, 47 C.F.R. § 1.1206(a)(1).

Sincerely,



J. Manning Lee

Enclosures
cc: Paul D'Ari



Regulatory Affairs

Teleport Communications Group
Two Teleport Drive, Suite 300
Staten Island, NY 10314 1004
Tel: 718.355.2000
Fax: 718.355.4876

May 2, 1996
BY FACSIMILE
202-418-1567

Mr. Paul D'Ari, Esq.
Common Carrier Bureau
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Re: Docket 93-162

Dear Mr. D'Ari:

Enclosed please find a brief explanation of the Channel Assignment issue.

This will be filed as an ex parte communications with the Secretary's office of the Commission on May 3, 1996.

Please feel free to call me at 718-355-2671, or Steve Andreassi, TCG's Manager of Regulatory Affairs at 718-355-2977, to discuss this further.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Manning Lee". The signature is stylized with a large, looping initial "J" and a long, sweeping underline.

J. Manning Lee
Vice President, Regulatory Affairs

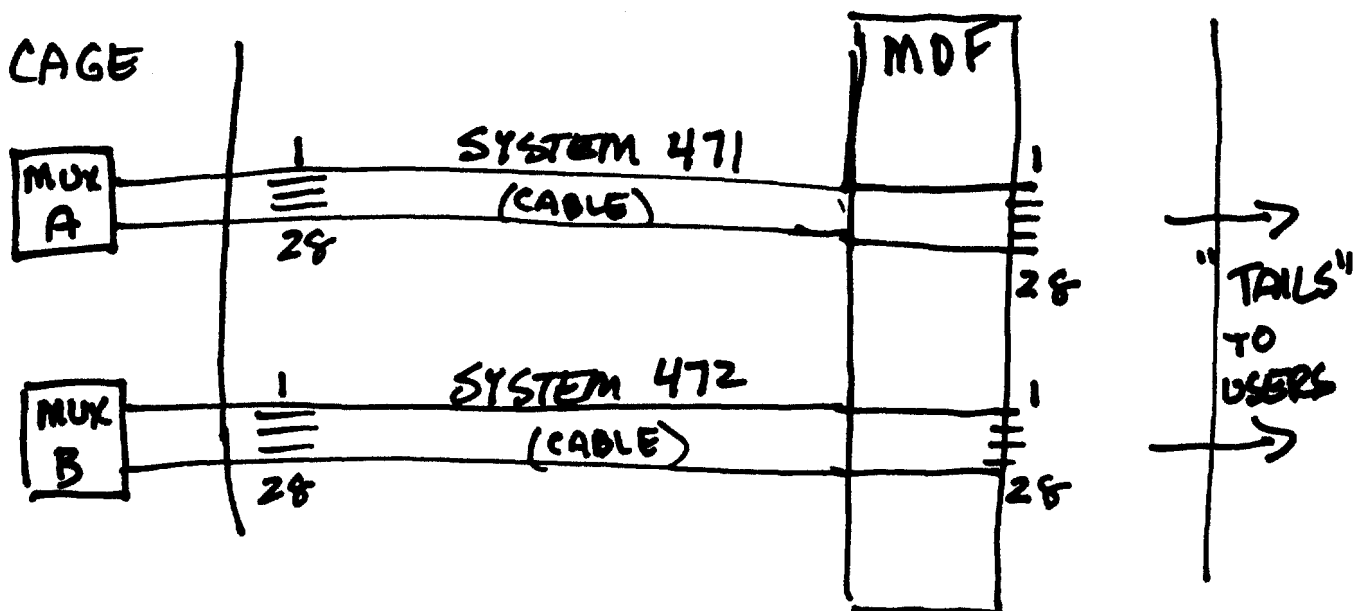
CHANNEL ASSIGNMENT CONTROL

Channel Assignment refers to the determination of the physical termination point (or connection point) for a circuit. In collocation situations, circuits are hybrids. The "tail" of the circuit is usually a LEC-provided DS1 that connects an end-user to a collocation arrangement at a LEC's central office. This LEC-provided "tail" is cross connected by the LEC at its central office to a cable that is connected to the collocator's facilities.

The LEC-provided tail must be cross-connected to a circuit that runs into the collocator's network. This is accomplished via the use of a small cable on the LEC's main distribution frame ("MDF"), which is used to connect a point where the "tail" of the circuit begins, to another point on the MDF that is pre-assigned to the collocator. This connection is made between two digital cross connect panels on the frame, one for tail circuits, and one dedicated to the use of the interconnector.

The Right Way

Once a collocation cage is established, the initial connections between the collocator's network and the LEC's network are established by "hard-wiring" cables between the collocator's multiplexers and the LEC's MDF. These facilities, generally cables containing numerous copper "pairs," are given system or facility ID's by the LEC. In the example diagram below, the interconnector (TCG) knows that LEC System 471 (and all of its associated pairs) is connected to TCG Multiplexer A in its collocation cage. Likewise, the interconnector knows that LEC System 472 is connected to TCG Multiplexer B, and so on. These pre-wired connections are established first, before any services are placed on the TCG Multiplexers.



One of the most common applications for collocated services is for Interexchange Carriers to utilize an interconnector's network between its point of presence ("POP") and the interconnector's collocation space at the LEC's central office. From there, it will reach an end user by cross connecting to an LEC-provided DS1 "tail" that goes between the LEC MDF and the end user. The interconnector would order this "tail" from the LEC. It is at this point where channel assignment becomes crucial. In the example above, the interconnector places the order which includes the assignment of the circuit up to the LEC's MDF. As TCG customers require the use of "tails" from the LEC, then TCG will order services from the LEC to be connected to them. If, for example, Multiplexer A is used by TCG to provide a DS3 to AT&T and Multiplexer B is used by TCG to provide a DS3 to MCI, TCG needs to be able to tell the LEC to, for example, connect Customer Smith's DS1 to Channel 8 on System 471, because Mr. Smith is an AT&T customer, while Customer Jones' circuit is connected to Channel 22 on System 472 (because Mrs. Jones is an MCI customer).

This process is efficient, low cost, and effective. Because the collocator can tell the LEC to connect the tail circuit to channel pair number 8 on system 471, the collocator does not have to wait for the LEC to select a channel assignment. It is TCG's experience that, in those few states where LECs still insist on channel assignment control, it can take several days for the LEC to tell TCG where it is going to put the circuit, and it usually tells TCG the channel assignment at the last minute, meaning that TCG must scramble to implement the circuit.

By contrast, where the collocator provides the channel assignment, this allows the collocator to immediately design the network configuration between the TCG customer and the LEC's main distribution frame. Concurrently, the LEC will do its provisioning work between its central office and the end user's premise.

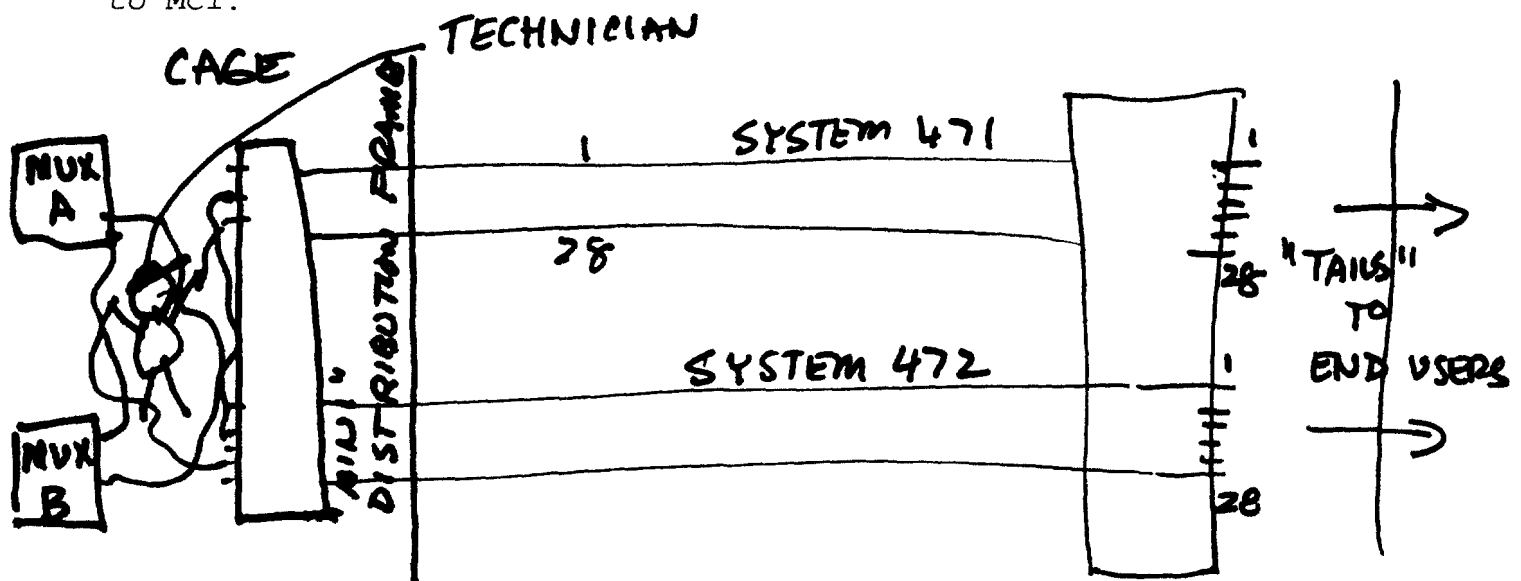
Additionally, since the circuit is pre-wired all the way to the MDF, TCG can electronically activate a new circuit for the customer from its distant network control center without having to send a TCG employee to the cage location in order to manually connect the circuit. TCG believes that any LEC arrangement, like channel assignment control, that forces competitors to discard cost-effective, electronic network management processes in exchange for dispatching technicians with pliers can only harm the competitor and provide no public interest benefits.

It is also extremely important to recognize that the channel pair locations on the MDF for Systems 471 and 472 are not in use until TCG tells the LEC to install a circuit on them. *Thus the LEC has nothing "invested" in those channel assignment locations.* It is, for example, equally convenient for the LEC to install a new DS1 on Channel 8 of System 471 as it is to install a new circuit on any other open channel of that system, since it has

nothing connected to any of them. By contrast, the collocator has much money and system processes invested in those channel assignments. The collocator has an entire DS3 network facility - which might extend for many miles through its network - completely homed in on those 28 channel assignment locations at the LEC's office, waiting for end user "tails" to be connected to it so that an end to end service can be delivered. Therefore what gets connected to those channel assignments is extraordinarily important to the collocator, but means nothing to the LEC.

The Wrong Way

If the LEC does not give the collocator channel assignment control, unnecessary delays, additional costs, are introduced into the provisioning process. In the example above, if the LEC has channel assignment control over the two systems, the interconnector cannot design its own circuit, and must instead wait for the LEC to provide it with a design layout record (DLR), which will tell the interconnector which of the hardwired circuits the LEC will connect to the end user tail circuit. There is, however, no expectation that the LEC will put the circuit where it "belongs". For example, if the LEC insists on channel assignment control then there is a risk that when AT&T Customer Smith's order reaches the LEC, the LEC may (because it does not really care where it puts the circuit) assign it to an open channel on System 472 (which TCG has dedicated to MCI.) The only way that the collocator can protect itself from such an event is to establish a "mini" distribution frame within its collocation cage to intercept all the circuits and route them to the proper multiplexer. This means, however, that TCG must send a technician to its cage each time it wants to establish a new circuit, since the technician must "cross connect" from that mini-distribution frame to the correct multiplexer. In our example, AT&T has all of its traffic dedicated to multiplexer A. Normally, under proper circumstances, TCG would order from the LEC a tail circuit to connect to a cable pair on System 471 for an AT&T customer. However, if the LEC has assignment control, it may assign a cable pair on system 472, which would be dedicated to MCI.



In this example, TCG must then dispatch a technician to reroute this circuit off of the "mini" distribution frame to the correct multiplexer. In such a circumstance, the collocator incurs additional costs, has to wait longer to turn up services -- an important competitive disadvantage given that LECs advertise that they will turn up service to their customers when they want it -- and has to install additional and unnecessary equipment (the mini distribution frame).

OTHER OBSERVATIONS

It is TCG's understanding, from discussions today with its engineering staff, that New England Telephone today continues to insist on channel assignment control. However, several months ago even New England Telephone agreed, on a test basis, to give TCG channel assignment control at a small collocation office in Cambridge, Massachusetts, where it is TCG's understanding that the channel assignment process has been working well. New England Telephone's affiliate, New York Telephone, has always given TCG channel assignment control.

There is no direct relationship between POT bays and channel assignment control. Typically, POT bays are hardwired through to the MDF, so there is no need to assign channels on the POT bay on a circuit by circuit basis. (The POT bay in fact serves no useful function whatsoever, and therefore it is not surprising that it is simply hardwired in since it does not do anything anyway.) Whether there is a POT bay in the middle of the circuit or not, the circuits can be pre-wired straight through to the MDF without any need for the LEC to control the channel assignment.

Finally, TCG wishes to point out that, when one of its interexchange carriers establish connections into the TCG network, TCG gives THEM channel assignment control over their interconnecting facilities, for the same reason that it needs such control at the other end of the circuit -- the assignment of those channels is most important to the carrier that has connected its network to those cables, whereas the interconnecting carrier should be completely indifferent to where it happens to interconnect a new circuit to those channels.